

EXHIBIT 1

MAR 10, 2022

Margaret J. Self

CLERK, STATE GRAND JURY

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA,)	Case No: 2021-GS-47-30
)	
)	SUPERSEDING
)	INDICTMENT FOR OBTAINING
v.)	SIGNATURE OR PROPERTY BY FALSE
)	PRETENSES, MONEY LAUNDERING,
)	COMPUTER CRIME, CRIMINAL
RICHARD ALEXANDER MURDAUGH,)	CONSPIRACY, FALSE STATEMENT OR
CORY HOWERTON FLEMING,)	MISREPRESENTATION, AND BREACH
)	OF TRUST WITH FRAUDULENT INTENT
Defendants.)	
_____)	

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on March 10, 2022, the State Grand Jurors present upon their oath and charge as follows:

COUNT ONE
OBTAINING SIGNATURE OR PROPERTY BY FALSE PRETENSES
VALUE \$10,000 OR MORE
S.C. Code Ann. § 16-13-240(1)
CDR Code: 3471

That RICHARD ALEXANDER MURDAUGH did, in Beaufort County, on or about January 9, 2019, by false pretenses or representation obtain the signature of a person to a written instrument and money or other property from another person, with the intent to cheat or defraud that person of money or property, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, MURDAUGH convinced the Satterfield family that after Gloria's death he would help Gloria's sons recover against his insurance for a fall that Gloria suffered at the

RICHARD ALEXANDER MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$403,500 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure for the beneficiaries of the Estate of Gloria Satterfield, but was being used to facilitate the illegal arrangement he had with MURDAUGH. These transactions exceeded \$100,000 in a twelve month period.

All in violation of section 35-11-740 of the South Carolina Code of Laws, and such conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT FIFTEEN
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553

That CORY HOWERTON FLEMING, in Beaufort County, on or about some time

in May 2019, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family and personal representatives of Gloria Satterfield, who was his housekeeper of many years, RICHARD ALEXANDER MURDAUGH convinced the family of Gloria Satterfield to hire FLEMING to represent Gloria's estate. Thereafter, MURDAUGH as the defendant in the action involving the Estate of Gloria Satterfield and FLEMING as the plaintiff's lawyer in the action did conspire to surreptitiously give MURDAUGH a split of FLEMING's fee from the insurance settlement. To achieve this end, FLEMING caused \$2,961,931.95 in proceeds from an insurance settlement to be disbursed in a check on his trust account made out to "Forge", and delivered to MURDAUGH. FLEMING knew that this check was not going to the real Forge Consulting, LLC, and was not actually being used to set up a structure to benefit the beneficiaries of the Estate of Gloria Satterfield. Throughout the FLEMING's representation and handling of the case, in dealings with others involved in the case, FLEMING as the plaintiff's lawyer made false statements and misrepresentations, and assisted, abetted, solicited, and conspired to make false statements and misrepresentations, about the manner in which the funds were going to be disbursed, about the setting up of an actual structure for the benefit of Gloria's estate

(that never occurred), and about costs and fees incurred in the litigation, while failing to disclose his surreptitious arrangement with MURDAUGH. The undeserved economic advantage exceeded \$50,000.

All in violation of Section 38-55-540 of the Code of Laws of South Carolina, and such conduct involving a violation of the South Carolina Anti-Money Laundering Act, or a crime related to a violation of the Anti-Money Laundering Act, and such conduct also involving a crime involving computer crimes, or a conspiracy or solicitation to commit a crime involving computer crimes, and such conduct having not been authorized by law.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

**COUNT SIXTEEN
FALSE STATEMENT OR MISREPRESENTATION
\$50,000 OR MORE
S.C. Code Ann. § 38-55-540(A)(4)
CDR CODE: 3553**

That RICHARD ALEXANDER MURDAUGH, in Beaufort County, on or about some time in May of 2019, did, with an intent to injure, defraud, and deceive, knowingly make a false statement or misrepresentation, and did knowingly, assist, abet, solicit, or conspire with a person to make a false statement or misrepresentation, with the intent of obtaining or causing another to obtain or attempting to obtain or causing another to obtain, an undeserved economic advantage or benefit, in connection with an insurance transaction, to wit:

While relying on his prestige and reputation as a lawyer, and the trust of the family